

## **REMARKS**

Reconsideration of this application and entry of this Amendment is respectfully requested.

### **Claim Objections**

The objection to claim 22 is believed obviated by the amendment to claim 22 at line 19 wherein “the” has been changed to -- a --.

### **Claim Rejections – 35 USC § 102**

Claims 1-3, 10, 11 and 14-16 have been rejected under 35 USC §102(b) as being anticipated by U.S. Patent No. 6,057,626 to *Tanaka et al.* This ground of rejection is respectfully traversed.

Claim 1 has been amended at line 15 to recite that the plurality of arms extend “radially” from the base portion. Support for this recitation is found in the specification in original claim 10. Support for the additional recitation at lines 24-27 of claim 1 can be found in Figs. 5(a) and 5(b).

Claim 1 now includes the recitation that the connector is located at the distal end of the arm and is located radially outwards with respect to the segment connection portion. In this way the coil is easily connected to the connector. In addition, since the connector is directly connected to the coil, current is capable of flowing from one coil to another coil through the short-circuit member without flowing through the segment. This permits current to flow from one coil to another coil without attenuating. These limitations are neither anticipated nor suggested by *Tanaka et al.*

Furthermore, in *Tanaka et al.*, the connector 101 in Fig. 22 is connected to the commutator segment 27 (column 5, lines 51-59), and the commutator segment 27 is connected to the coil 26 (column 3, lines 49-52). As shown in Fig. 2 of *Tanaka et al.*, the commutator segment 27 has a hook 37 which is directly connected to the coil 26. Thus, the connector 101 in Fig. 22 of *Tanaka*

*et al* is connected to the coil 26 by means of the commutator segment 27, but is not directly connected to the coil 26. Also, since the connector 101 of *Tanaka et al* is connected to the commutator segment 27, it should be understood that the connector 101 corresponds to the segment connection portion rather than the claimed connector. Accordingly, *Tanaka et al* does not anticipate, nor suggest that the short-circuit member is provided with a connector that is located radially outwards with respect to the segment connection portion and is directly connected to the coil.

Furthermore, with regard to claim 16, which recites that at least part of the laminated body is located in the axial range of the core, it should be noted that *Tanaka et al* does not disclose that the laminated body is located in the axial range of the core. As shown in Figs. 1 and 2 of *Tanaka et al*, the laminated body (equalizer assembly) 30 is spaced from the core 25 (23) in the axial direction, but is not located in the axial range of the core 25 (23).

Therefore, reconsideration and withdrawal of the rejection of claims 1-3, 10, 11 and 14-16, is respectfully requested.

#### **Claim Rejections – 35 USC §103**

The rejection of claims 4-7 under 35 USC §103 as being unpatentable over U.S. Patent No. 6,057,626 to *Tanaka et al* is respectfully traversed.

Each of claims 4, 5, 6 and 7 are dependent on claim 1 and incorporate the limitations recited therein. The distinctions between the claimed invention and *Tanaka et al* have already been discussed and those arguments are incorporated herein. In essence, applicants' claimed invention recites that each short circuit member has a base portion and a plurality of arms radially extending from the base portion and wherein the arms include specific arms, each of which is provided with a connector at a distal end, and wherein each connector is located radially outwards with respect to the segment connection portion and is directly connected to an end

of one of the coils. It is respectfully submitted that these embodiments are neither disclosed nor suggested by Tanaka et al. Therefore claims 4-7, which recite additional limitations to claim 1 are respectfully submitted to be patentably distinct over Tanaka et al. Accordingly, reconsideration and withdrawal of this ground of rejection is respectfully requested.

The rejection of claims 17, 18 and 20 under 35 USC §103 as being unpatentable over Tanaka et al in view of U.S. Patent No. 6552,468 to Lau et al is respectfully traversed.

Each of claims 17, 18 and 19 are ultimately dependent on claim 1 and incorporate the limitations recited therein. Applicants respectfully submit that claim 1 is patentably distinct over Tanaka et al for the reasons already discussed that are also incorporated herein.

It is respectfully submitted that the combination of Lau et al with Tanaka et al compounds rather than resolves the deficiencies of Tanaka et al. The examiner maintains that Lau et al discloses a motor including a coupling member for coupling the core with the rotary shaft, wherein the coupling member is fitted about the rotary shaft and fitted to the center bore, and wherein the coupling member has a hollow portion for accommodating at least a part of the commutator for the purpose of forming a double insulated motor, relying on column 2, lines 33-36 of Lau et al.

However, the coupling member 26 of Lau et al does not have a hollow portion for accommodating part of the commutator 20 or a laminated body. Fig. 1 of Lau et al shows that the commutator 20 is spaced from the core 18 in the axial direction. Lau et al also does not disclose a laminated body as claimed by applicants in claim 16 from which claims 17, 18 and 20 depend.

Accordingly, Lau et al does not resolve the deficiencies of Tanaka et al but rather compounds them. Therefore, reconsideration and withdrawal of this ground of rejection is respectfully requested.

The rejection of claims 19 and 21 under 35 USC §103 as being unpatentable over Tanaka et al in view of Lau et al, and further in view of U.S. Patent No. 6,181,046 to Daikoku et al is respectfully traversed.

Claims 19 and 21 depend on claims 18 and 17, respectively, and are each ultimately dependent on claim 1, and incorporate the limitations recited therein.

The deficiencies of Tanaka et al in combination with Lau et al have already been discussed in the context of the rejection of claims 17, 18 and 19 and those arguments are incorporated herein. It is respectfully submitted that the examiner's further reliance on Daikoku et al further compounds rather than resolves these deficiencies.

The examiner maintains that Daikoku et al discloses a motor wherein the laminated body is located between the core and the commutator with respect to the axial direction of the rotary shaft for the purpose of reducing the size of the motor, relying on column 1, lines 34-37. However, Daikoku et al compounds the deficiencies of the rejection by not disclosing or suggesting a short-circuit member having a base portion and a plurality of arms radially extending from the base portion wherein each of the arms of each short circuit member corresponds to one of the predetermined numbers of the segments to be short-circuited, and wherein the arms include specific arms, each of which is provided with a connector at a distal end, wherein each connector is located radially outwards with respect to the segment connection portion and is directly connected to an end of one of the coils. Therefore, reconsideration and withdrawal of this ground of rejection is respectfully requested.

The rejection of claims 22 and 23 under 35 USC §103 as being unpatentable over Tanaka et al in view of Daikoku et al is respectfully traversed.

The deficiencies of Tanaka et al and Daikoku et al have already been discussed in the context of the rejection of claims 19 and 21 and those arguments are incorporated herein. Independent claim 22 recites all the features of amended claim 1 and includes the additional recitation of the structure of the laminated multilayer base portion, and the arms being formed such that all the segment connection portions are located in a single place perpendicular to the axis of the laminated body.

It is respectfully submitted that Tanaka et al in combination with Daikoku et al does not disclose or suggest claims 22 and 23 in an obvious manner. Therefore, reconsideration and withdrawal of this ground of rejection is respectfully requested.

The rejections of claim 24 and 25 under 35 USC §103 as unpatentable over Tanaka et al in view of Daikoku et al and further in view of Lau et al is respectfully traversed. Claims 24 and 25 are ultimately dependent on claim 22, and include all the limitations recited therein.

The deficiencies of Tanaka et al and Daikoku et al have already been discussed in the context of the rejection of claims 22 and 23 and those arguments are incorporated herein. The deficiencies of Lau et al have already been discussed in the context of the rejection of claims 17, 18 and 19 and those arguments are incorporated herein. It is respectfully submitted that the combination of Tanaka et al, Daikoku et al and Lau et al compounds the deficiencies in the combination of references rather than resolves them.

Accordingly, reconsideration and withdrawal of this ground of rejection is respectfully requested.

**Allowable Subject Matter**

Applicants acknowledge the allowability of claims 8, 9, 12 and 13. Claim 8 has been rewritten in independent form to include the limitations of original claim 1. Claim 9 is dependent on claim 8. Claim 12 has been rewritten in independent format to include the limitations of original claim 1 and claim 10. Claim 13 is dependent on claim 12.

Therefore, it is respectfully submitted that the amendment of claims 8 and 12 into independent format, to include all the limitations of the base claim, and any intervening claims, places claims 8, 9, 12 and 13 in condition for allowance.

Accordingly, in view of the above amendments and arguments it is respectfully submitted that all claims in this application are now in condition for allowance and such favorable action is respectfully requested.

Respectfully submitted,



Charles Rodman, Reg. No. 26,798  
Attorney for Applicant

Dated: December 10, 2004  
RODMAN & RODMAN  
7 South Broadway  
White Plains, New York 10601

Telephone: (914) 949-7210  
Facsimile: (914) 993-0668  
967-17